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LIQUID WASTE, DEFINITION OF

JUN 28 1981

OFFICE OF WATER AND WASTE MANAGEMENT

Mr. Chris Howell
Chemical Processors, Inc.
5501 Airport Way south
Seattle, WA 98108

Dear Mr. Howell:

I am in receipt of your letter of June 1, 1981 to Mr. Ken Schuster regarding your request for a working definition of a "liquid" waste.

As you are aware, the Agency is actively working to develop improved laboratory procedures for defining both "ignitable" and "liquid." In the interim you may employ the following working definition of a "liquid" when evaluating wastes:

A liquid is any material that will pass through a 0.45 micron filter at a pressure differential of 75 psi. If the material to be evaluated consists of 2 or more phases then the phases should be separated by centrifugation or other means prior to evaluating whether any of the phases meet the above definition. "Free liquids" as defined in §260.10(a)(25) are subset of this broader class of liquids.

Any waste on phases of a waste found to meet the above definition of a "liquid" should then be evaluated for ignitability using the procedures in §261.21. All such wastes which contain or consist of liquids which have a flash point below 60 C are to be considered as ignitable wastes.

I hope this response serves to answer your question. If you would like further information please feel free to give me a call at (202) 755-9187.

Sincerely,

RO 12034

Original Document signed

David Friedman
Manager
Waste Analysis Program
Hazardous and Industrial Waste Division (WH-565)

I think this covers all of the situations that may be encountered.
I hope this is helpful to you.

Sincerely yours,

Gary N. Dietrich
Associate Deputy Assistant Administrator
for Solid Waste

bcc: Filomena Chau w/incoming
Jack Lehman
Alan Corson
Dotz Darrah
Regional A&HM Division Directors, EPA Region I, III-X